

**NATIONAL
INDIAN
GAMING
COMMISSION**

SEP 7 1999

Gary J. Montana, Tribal Attorney
Ho-Chunk Nation
W9814 Airport Road
P.O. Box 667
Black River Falls, WI 54615

Dear Mr. Montana:

This letter responds to your request of June 1, 1999, as modified by your letter of July 6, 1999, to review amendments to the Ho-Chunk Nation's Amended and Restated Gaming Ordinance, adopted by Resolution No. 5-11-99L, and amendments to the Nation's Internal Control Manual which were adopted by Resolution No. 5-11-99M. As to the amendments to the Nation's Amended and Restated Gaming Ordinance, this letter constitutes approval of those amendments under the Indian Gaming Regulatory Act (IGRA).

Although NIGC regulations require that all tribal gaming operations adopt internal control systems which are at least as stringent as the NIGC's Minimum Internal Control Standards, the Commission has not established a requirement that tribal internal control manuals be reviewed and approved by the Chairman.

Thank you for submitting the amendments for review and approval. The NIGC staff and I look forward to continuing to work with you and the Ho-Chunk Nation on future gaming issues.

Sincerely yours,



Montie R. Deer
Chairman



HO-CHUNK NATION LEGISLATURE
Governing Body of the Ho-Chunk Nation

5-11-1999

HO-CHUNK NATION LEGISLATURE

AMENDMENTS TO AMENDED & RESTATED GAMING ORDINANCE
RESOLUTION 5-11-99 L

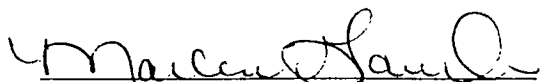
- WHEREAS,** on November 1, 1994, the United States Secretary of Interior approved a new Constitution for the Ho-Chunk Nation, formerly known as the Wisconsin Winnebago Nation; and
- WHEREAS,** the Legislature of the Ho-Chunk Nation is the duly constituted governing body of the Ho-Chunk Nation, organized and established pursuant to the Indian Reorganization Act of 1934, and given certain powers pursuant to the Constitution and By-laws of the Ho-Chunk Nation; and
- WHEREAS,** Article V, Section 2 (a) and (x) grants power to the Legislature to make laws, including codes, ordinances, resolutions and statutes and to enact any other laws, ordinances, resolutions and statutes necessary to exercise its legislative power delegated by the General Council pursuant to Article III; and
- WHEREAS,** the Ho-Chunk Nation, pursuant to Article III of the Constitution of the Ho-Chunk Nation has adopted the Ho-Chunk Nation Amended and Restated Gaming Ordinance ("Ordinance"); and
- WHEREAS,** there is a need to revise and update said Ordinance.

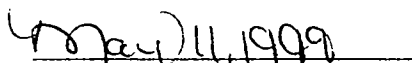
NOW, THEREFORE BE IT RESOLVED, that the Ordinance amended on 09/06/96 and any subsequent Amendments of said Ordinance is hereby revised to reflect the following Amendment(s) attached hereto as Exhibit(s) A, B, C, D, E, F, G, H & I:

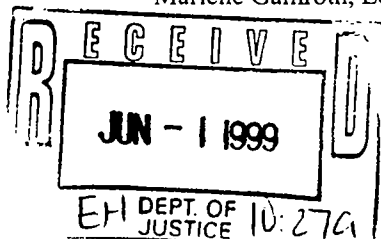
NOW THEREFORE BE IT RESOLVED that the above Amendment(s) A, B, C, D, E, F, G, H & I are to become effective immediately upon adoption of this Resolution.

CERTIFICATION

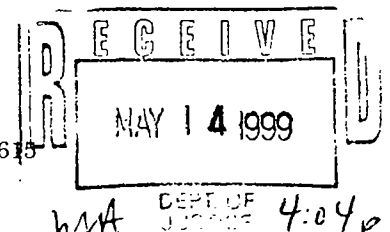
I, the undersigned, as Secretary for the Ho-Chunk Nation Legislature, hereby certify that the Legislature of the Ho-Chunk Nation, composed of 11 members, of whom 10 constituting a quorum were present at a meeting duly called and convened and held on the 11th day of May, 1999, that the foregoing resolution was adopted at said meeting by an affirmative vote of 8 members, 0 opposed, and 2 abstaining, pursuant to the authority of Article V, Section 2(a) and (x) of the Constitution of the Ho-Chunk Nation approved by the Secretary of the Interior on November 1, 1994, and that said resolution has not been rescinded or amended in any way. I further certify that this is a verified copy of said resolution.


Marlene Gamroth, Legislative Secretary


Date



Executive Offices
W9814 Airport Road P.O. Box 667 Black River Falls, WI 54615
(715) 284-9343 Fax (715) 284-3172 (800) 294-9343



AMENDMENT A

DEFINITIONS:

Amend Section 209. "Gaming Facilities" means the buildings and associated real property within which the Nation conducts Class II and Class III gaming, but shall not include any adjacent or attached non-gaming enterprises such as hotels, retail shops and eating establishments.

Amend Section 230. "Vendors" means any person, corporation, sole proprietorship, partnership or any individual, including but not limited to, a merchant, retail dealer, supplier, importer, wholesale distributor who transfers property, goods or other services by sale to a gaming facility, whether gaming or non-gaming related.

Add Section 231. "Wisconsin Gaming Commission" means the State of Wisconsin Gaming Commission its successor, and its authorized officials, agents or representatives.

AMENDMENT B

Sec. 104. The regulations and rules set forth in this Ordinance shall govern all gaming operations conducted on the Nation's Land. To the extent that the Nation's existing or subsequently adopted personnel manuals, policies and procedures are inconsistent with this Ordinance, this Ordinance shall supersede such personnel manuals, policies and procedures.

AMENDMENT C

Sec. 502. Class II games. The Legislature shall adopt standards of operation and management for bingo and other Class II games and, pending such adoption, may impose such interim standards as it may determine necessary to protect the integrity of such games. The standards of operation and management for Class II games shall provide, at a minimum, that:

- (a) No person under the age of 18 shall be permitted to participate in any non-charitable Class II gaming as a player or contractor, provided, that all persons may participate in charitable Class II gaming approved by the Gaming Commission of the Ho-Chunk Nation and any person may be employed by any Class II gaming operation, if at least 16 years of age.

AMENDMENT D

Sec. 807. Powers and duties of Commission. The Commission shall be responsible for enforcing this Ordinance and shall ensure compliance with this Ordinance, IGRA and the Compact, any licenses issued, and any Resolutions of the Legislature specifically enforceable by the Commission. In addition to other duties specifically delegated to the Commission in this Ordinance, the Commission shall have the following powers and duties:

- (a) The Commission may recommend policies and guidelines relating to gaming, including any amendments to the Ordinance, to the Legislature.
- (b) The Commission shall monitor all Class I, Class II and Class III gaming on the Nation's Lands and all monthly reports and annual audits of such activities to insure that such activities conform to the provisions of this Ordinance, IGRA and the Compact.
- (c) Except as otherwise provided, the Commission shall issue and deny gaming licenses in accordance with Chapter 12 of this Ordinance.
- (d) The Commission or the Legislature shall refer any apparent violations of this Ordinance, IGRA, the Compact, or violations of License conditions to the Department of Justice for investigation as provided under Sec. 1803 of this Ordinance.
- (e) The Commission may refer any apparent violations of the Nation's laws of general applicability, such as the Nation's Personnel Policies and Procedures and the Nation's Budget Process and Appropriations Act, in the Operation of the Nation's Gaming Facilities to the Office of the President and Executive Director of Business for their consideration and action as they may determine appropriate.
- (f) The Commission or Legislature may impose penalties for violations of this Ordinance, any Order of the Commission, or any License condition in accordance with Chapter 18 of this Ordinance. The Commission may rejoin or otherwise prevent any violation of this Ordinance, any Order of the Commission, any license condition or other laws relating to gaming on the nation's Lands.
- (g) The Commission shall prepare and recommend an annual budget for the purpose of allocating funds to the Commission for its necessary activities and expenses, which must be approved by the Legislature. The Commission may in accordance with any approved budget employ such staff from time to time as it deems necessary to fulfill its responsibilities under this Ordinance.

- (h) The Commission shall use the Department of Justice as its counsel, or such other counsel to whom the Department of Justice may refer such matters.
- (i) The Commission shall have the authority and responsibility to interpret this Ordinance and its rules in proceedings before it.
- (j) The Commission shall have such other powers as are delegated to it from time to time by the Legislature.
- (k) Except as otherwise provided in this Ordinance or any Management Contract, the Commission shall comply with all policies, guidelines, laws, resolutions and regulations of the Legislature.
- (k) Nothing in this section shall prevent the Commission from attempting to obtain voluntary compliance through warning, conference or any other appropriate means.

Sec. 810. Commission Hearings.

- (a) The Commission shall afford an Applicant an opportunity for a hearing prior to any final action by the Commission denying a license application.
- (b) The Commission shall afford a Licensee the opportunity for a hearing prior to taking final action resulting in the imposition of any penalties which the Commission is authorized to impose pursuant to this Ordinance or the Commission's Rules of Practice and Procedure. In the case of a proposed penalty of \$250 or less which does not involve any suspension or revocation of a license, the Commission shall notify the Licensee of the proposed penalty and the basis therefore and allow the Licensee the option of paying the penalty without a hearing or contesting the basis for imposing the penalty at a hearing following a notice to the Commission requesting a hearing.
- (c) Nothing in this section shall limit the Commission's authority to suspend a License summarily without a hearing pursuant to this Ordinance
- (d) The burden of proving fitness and suitability for a License shall be on the Applicant.
- (e) Where a person or entity is charged with violation of this Ordinance, a decision of the Commission pursuant to this Ordinance, a License condition, the Compact, the IGRA or any other applicable laws, regulations or agreements concerning the

regulation of gaming, including but not limited to any agreement relating to gaming with the Ho Chunk Nation, the party alleging the violation shall carry an initial burden of establishing a prima facie case violation. If the Commission finds that prima facie case has been established, the burden to rebut the charge shall shift to the person or entity.

Sec. 820. Determination by the Commission

- (a) The Commission shall make all determinations of issues before it by a majority vote of at least a quorum of the Commission.
- (b) All significant determinations made by the Commission shall be documented in a written resolution. Significant determinations include the grant, denial or cancellation of a License, a finding of a violation of the Ordinance, the Compact, the IGRA, the conditions of any license issued by the Commission, any decision rendered by the Commission pursuant to this Ordinance, or any other applicable laws, regulations or agreements regulating gaming, including, but not limited to, any agreement with the Ho Chunk Nation, and the imposition of any sanctions or penalties.
- (c) A copy of any resolution reached pursuant to this section shall be served upon the Applicant or Respondent by registered or certified mail, or may be served personally.

Sec. 821. Sanctions If any party or its attorney fails to comply with any provision of this Ordinance, the Commission's Rules of Practice and Procedure, the Compact, the IGRA, the conditions of any license issued by the Commission or the Legislature, any decision by the Commission rendered pursuant to this Ordinance or Resolution of the Legislature, or the tribal court or any other applicable laws, regulations or agreements regulating gaming, including, but not limited to, any agreement with the Ho Chunk Nation, regarding any matter, including, but not limited to, discovery matters and the failure to appear at a hearing at the scheduled time, the Commission, Legislature, or tribal court upon motion or upon its own initiative, may in its discretion impose upon such party or attorney, or both, appropriate sanctions in regard to the failure(s) as are just, including, but not limited to, the following:

- (a) An order prohibiting the use of any witness, document or tangible thing which should have been disclosed, produced, Exhibited or exchanged pursuant this Ordinance, the Commission's Rules of Practice and Procedures, or any order of the Commission;
- (b) An order that designated facts shall be taken as established;
- (c) An order that the disobedient party may not support or oppose designated claims or defense;

- (d) An order striking pleadings or parts thereof, or staying further proceedings or dismissing the proceeding or any part thereof, or entering a judgement by default against the disobedient party;
 - (e) A finding against the disobedient party; or
Any penalty provided for in chapter 18 of this Ordinance
- (ii) Trial Court Review of the Record. Upon receiving a petition of review which conforms to the requirements of this Section, the Commission shall have forty-five (45) days to transmit the record of its decision and to respond to the petition. The court shall schedule a hearing within thirty (30) days after receipt of the Commissions record and response to the petition to consider the appeal. The trial court judge shall preside at the meeting on the appeal. The court, in its discretion, may deny the appeal on the record and any written statements submitted, or it may grant the petition for review.

AMENDMENT E

CHAPTER 12. LICENSING PROCEDURES.

Section 1203. Application for License.

(b) No License shall be issued to any Applicant who has been determined by the Legislature or the Commission to be a person whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the public interest or to the effective regulation and control of gaming, or create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, or activities in the operation of gaming or the carrying on of the business and financial arrangements incidental thereto. The alleged violation of a Nation's law of general application not principally enacted to regulate gaming, such as the Nation's Personnel Policies and Procedures and the Nation's Budget Process and Appropriations Act shall not be the basis of non-suitability unless such conduct is part of a pattern of consistent disregard for the Nation's law.

Section 1208. Term of License; License Fee.

(a) Licenses shall be for a term *of two years*, and shall expire on the anniversary of the date of issue.

Add Section 1208. (b)

- (iv) Every gaming licensee has the responsibility during the term of each licensing term to assure that there exists a continued disclosure of facts and information relating to his or her suitability to hold a gaming license. Failure to disclose pertinent information as to suitability, pursuant to Section 1203 (a) (iv) and Chapter 15 in its entirety on a continuing basis shall be cause for revocation or suspension of a gaming license.

AMENDMENT F

CHAPTER 13. VENDOR LICENSING.

Section 1301. Vendor License.

(a) Vendors. All vendors, whether classified as gaming or non-gaming shall be subject to licensing and registration by the Commission as a condition precedent to conducting business with the Ho-Chunk Nation Gaming Facilities.

(i) Any classified non-gaming vendor, supplier, or general contractor who conducts business with the Nation's gaming facilities in an amount equal to or exceeding \$100,000.00 in any year shall register with the Gaming Commission and pay a bi-annual administrative fee of \$100.00. Non-gaming vendors who conduct business with the Nation's gaming facilities in amounts less than \$100,000.00 and exceeding \$10,000.00 shall register with the Gaming Commission and pay a bi-annual administrative fee of \$50.00. Any classified non-gaming contract below \$10,000.00 in any year shall be exempt from any registration and the payment of any bi-annual administrative fees.

Section 1303. Term of License; License Fees.

(a) Licenses shall be for a term of two (2) years, and shall expire on the anniversary of the date of issue.

(i) All vendor licenses must be renewed by written notice to the Commission by the vendor of their intent to renew said license with the required license fee.

(ii) Failure to file a written notice of intent to renew the vendor license, 60 days prior to the date of expiration by a vendor licensee, shall cause the Commission to issue a letter of expiration. The letter of expiration shall be sent, certified mail to the last known address of the vendor on the bi-annual due date of the license.

(iii) Failure to renew an existing vendor license may delay subsequent re-issuing of a vendor license to same vendor by the Commission.

(b) In order to recover the costs to the Nation of complying with the federal, tribal, and state regulatory processes applicable to Class II and Class III gaming, bi-annual license fees shall be imposed upon the filing of any application for a gaming vendor license, and upon every license renewal thereafter. The amount shall be a set fee of 250.00 per license renewal period. However, any actual costs and expenses associated and incurred with additional background and suitability investigations shall be assessed the vendor as per an actual cost billing. Vendors classified under Section(s) 1303 (b)(i)(g) will upon any renewal be assessed the regular fee of \$50.00. The schedule of fees for initial licensing of gaming vendors shall be as follows:

(i) Existing vendors and those applying for new licenses shall be assessed a non-refundable license fee based on the amount of business with the Nation's gaming facilities and those fees will be further based on the gross dollar amount received from the previous fiscal year:

a. Vendors conducting business with the Nation's gaming facilities in an amount equal to or exceeding \$1,000,000.00 shall be assessed a flat fee of \$10,000.00;

b. Vendors conducting business with the Nation's gaming facilities in an amount between \$500,000.00 to \$999,999.99 shall be assessed a flat fee of \$5,000.00;

c. Vendors conducting business with the Nation's gaming facilities in an amount between \$100,000.00 and \$499,999.99 shall be assessed a flat fee of \$2,500.00;

d. Vendors conducting business with the Nation's gaming facilities in an amount between \$50,000.00 and \$99,999.99 shall be assessed a flat fee of \$1,500.00;

e. Vendors conducting business with the Nation's gaming facilities in an amount between \$25,000.00 and \$49,999.99 shall be assessed a flat fee of \$750.00;

f. Vendors conducting business with the Nation's gaming facilities in an amount between \$10,000.00 and \$24,999.99 shall be assessed a flat fee of \$250.00;

g. Vendors conducting business with the Nation's gaming facilities in an amount less than \$10,000.00 shall be assessed a flat fee of \$50.00.

(ii) Classified gaming vendors who have not previously conducted business with the Nation's gaming facilities will be assessed a fee according to the above-indicated fee scale as to the gross dollar amount of the initial proposal of business with the Nation's gaming facilities.

(iii) In addition to any non-refundable license fee paid, the Ho-Chunk Nation Gaming Commission may require a vendor to pay such supplementary investigative fees and costs as may be incurred additionally by the Nation with respect to the actual background investigation of said vendor.

(a) The Ho-Chunk Nation Attorney General, and his/her designee, shall itemize the supplementary investigative fees and costs and submit a billing to the Gaming Commission for the purpose of a supplemented billing to the licensee.

(b) The Gaming Commission will not take any final action to approve any vendor license application, unless all license and investigative fees and costs have been paid in full.

AMENDMENT G

CHAPTER 15. CONFLICTS OF INTEREST PROHIBITED

Sec. 1502. Except as provided in secs. 1504, 105, 1506 and 1507, no Primary Management Official or employee of the Nation in any of its Gaming Operations shall:

- (a) Participate as a player *during working hours* in any Class II or Class III games conducted pursuant to this Ordinance, except:

Sec. 1508. Any employee upon separation from employment with any of the Nation's gaming facilities shall observe a fifteen (15) day cooling off period and shall not be allowed to participate in any gaming at the gaming facility from which the employee was released from employment during this period of time; provided, further that any out-going gaming commissioners, legislators and any surveillance and blackjack employees shall not participate in any gaming activity at any gaming facility for a period of thirty (30) days from the date of their separation from employment.

AMENDMENT H

CHAPTER 17. MISCELLANEOUS PROVISIONS

Sec. 1701. Right to Exclude Any Person from Premises at Any Time. Any person may be excluded from the Premises at the discretion of the General Manager or an appointed designee of the General Manager.

- (a) No person under the age of 21 years of age will be allowed to be on any of the Ho-Chunk Nation's Class III facility gaming floor at anytime during which alcoholic beverages are being sold or distributed, EXCEPT, those agents, employees, or contractors of the Ho-Chunk Nation who are actively engaged in employment duties, or are performing authorized services for or on behalf of the Ho-Chunk Nation (formerly known as the Wisconsin Winnebago Nation).
- (b) No person under of the age of 21 years of age will be allowed to be on any of the Ho-Chunk Nation's Class III gaming floor at anytime, provided, that any person under the age of 21 years may pass to and from any of the Nation's Class II and Class III gaming facility hotels, retail shops and eating establishments on premises when accompanied by a supervising adult.

AMENDMENT I

CHAPTER 18. ENFORCEMENT AND PENALTIES FOR VIOLATIONS

Amend Section 1801 Enforcement. Any person who:

- (e) Fails to observe the Commission's Rules of Procedure and Practice, License conditions imposed by the Commission or Legislature, or decisions of the Commission rendered pursuant to this Ordinance. Resolutions of the Legislature, or tribal court decisions shall be subject to civil penalties as provided in Sec. 1802.

Amend Section 1803 Investigations.

- (d) No applicant or licensee shall neglect or refuse to produce records or evidence or to give information upon written demand by the Department of Justice within seven (7) days of receipt of such request. No applicant or licensee shall interfere with any proper and lawful efforts by the Department of Justice to obtain such information. Every applicant, licensee, and all licensed manufacturers, distributors and vendors shall make their business offices, books and records available for inspection by the Department of Justice for purposes of conducting its investigation. Failure of any person or entity to comply with this Section may result in a denial of a license application, cancellation of a license, or the imposition of other penalties and sanctions.



HO-CHUNK NATION LEGISLATURE

Governing Body of the Ho-Chunk Nation

JUN - 7 1999

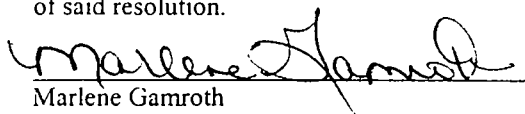
HO-CHUNK NATION LEGISLATURE AMENDMENTS TO THE INTERNAL CONTROL MANUAL RESOLUTION 5-11-99 M

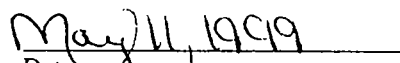
- WHEREAS,** on November 1, 1994, the United States Secretary of Interior approved a new Constitution for the Ho-Chunk Nation, formerly known as the Wisconsin Winnebago Nation; and
- WHEREAS,** the Ho-Chunk Nation ("Nation") is a federally recognized Indian Tribe, organized pursuant to the Indian Reorganization Act of 1934; and
- WHEREAS,** the Legislature of the Ho-Chunk Nation ("Legislature") is the duly constituted governing body of the Ho-Chunk Nation pursuant to the Constitution of the Nation; and
- WHEREAS,** Article V, Section 2 (a) of the Ho-Chunk Nation Constitution ("Constitution") authorizes the Legislature to make laws, including codes, ordinances, resolutions, and statutes; and
- WHEREAS,** Article V, Section 2 (x) of the Constitution authorizes the Legislature to enact any other laws, ordinances, resolutions, and statutes necessary to exercise its legislative powers; and
- WHEREAS,** under Section 503 of the Nation's Amended and Restated Gaming Ordinance the Legislature is to approve of Standards of Operation and Management for the Nation's Class III Gaming Facilities; and
- WHEREAS,** on January 14, 1997 the Nation's Legislature approved an Internal Controls Manual for the Nation's Class III Gaming Facilities; and
- WHEREAS,** the Legislature desires to make the amendments to the Internal Control Manual indicated in the attached pages.

NOW, THEREFORE, BE IT RESOLVED that the amendments to the Internal Controls manual indicated on the attached pages: A-27, A-29, C-8, C-12, C-49, D-5, D-24, E-6, E-8 and I-4, are hereby adopted and approved.

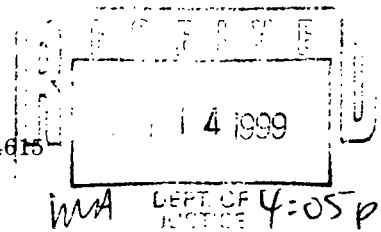
CERTIFICATION

I, the undersigned, as Secretary for the Ho-Chunk Nation Legislature, hereby certify that the Legislature of the Ho-Chunk Nation, composed of 11 members, of whom 10 constituting a quorum were present at a meeting duly called and convened and held on the 11th day of May, 1999, that the foregoing resolution was adopted at said meeting by affirmative vote of 10 members, 0 opposed, and 0 abstaining, pursuant to the authority of Article V, Section 2(a) and (x) of the Constitution of the Ho-Chunk Nation approved by the Secretary of the Interior on November 1, 1994, and that said resolution has not been rescinded or amended in any way. I further certify that this is a verified copy of said resolution.


Marlene Gamroth
Legislative Secretary


Date

Executive Offices
W9814 Airport Road P.O. Box 667 Black River Falls, WI 54615
(715) 284-9343 Fax (715) 284-3172 (800) 294-9343



Subsection 12

Gaming Integrity

A. General

1. Corrections to Written Documentation - Corrections to written documentation is made by crossing out the error with one thin line only. Where initials are required, the initials shall not cover or merge with any recorded numbers or document numbers.
2. Mechanical Stamp - All forms used to document Casino transactions (i.e. fill requests, fill slips, jackpot slips, exchange slips, etc.) will be mechanically stamped with the time and date upon preparation of the form and/or upon completion of transaction by the cage.
3. Posting of Game Rules - The casino shall conspicuously post game play procedures that are significant to patrons. The casino shall conspicuously post a notice that gaming is conducted and regulated by the Tribe, and the procedures that customers can follow to resolve player disputes.
- ~~4. No cameras are allowed in the Casino (photos and video may not be taken inside the Casino). Outside photos may be taken with proper approval.~~
5. Photos or video can not be taken/filmed or commercially used without the prior written permission of management ~~and the Ho-Chunk Nation Gaming Commission.~~
6. Casino patrons, guests or employees are not allowed to bring electronic devices into the Casino without proper approval.
7. Casino lighting must not reflect off the cards, chips or tokens in a way that would impede recording and viewing by surveillance cameras.
8. Count rooms, vaults and cashier cages must have room lighting hard wired. There may be no ability to turn off the lights from inside the room or near the doors.

9. Personnel (i.e. cashiers) in the cage and slot booths, will place currency, fill/credit documents, etc. within the identifying marks placed on the counters by Surveillance.
10. Elevators used for transporting drops, cash and people at the same time must have video surveillance inside the elevator and at each opening on the floors. Elevators which do not carry people need not have surveillance inside the elevator but must still have surveillance at each opening on the floors.
11. The casino shall have a minimum of one alarm button per customer transaction area (i.e. each cashier station in the cage and slot booths).
12. Counterfeit Currency Procedures - Procedures are developed and implemented for the handling of counterfeit currency. These procedures shall be approved by the Ho-Chunk Nation Gaming Commission prior to implementation.

B. Employee Requirements

1. Age Requirement - No person under 18 years of age may be employed in the direct conduct of gaming.
2. Gaming by Key Persons - The Ho-Chunk Nation Gaming Ordinance (Chapter 15) designates who may or who may not play at the Casinos.
3. Incompatible Gaming Positions among Gaming Employees - The casino shall develop procedures to ensure the segregation of duties among incompatible positions for immediate family members (i.e. immediate family members do not participate in the same transactions such as fills/credits).
4. Criminal and Background Restrictions - The Ho-Chunk Nation Gaming Ordinance designates the procedures to make determinations of suitability for persons employed in the conduct of gaming in accordance with applicable Federal and Tribal laws.
5. All pockets on casino uniforms will be sewn shut on all cash handling (or cash equivalent) employees.

C. Surveillance

1.

General

- a. The casino must have a surveillance system that covers the entire casino including the cage, count areas and gaming areas. Monitors and controls for the surveillance equipment are located in a surveillance room which cannot be observed by persons on the gaming floor.
- b. Access - The surveillance room must be separate from other functions of the casino and shall remain locked. Access shall be limited to Surveillance personnel ~~and Tribal Inspectors Office personnel~~ and the General Manager of the Gaming Facility.
- c. Surveillance cameras will be in the surveillance rooms and should provide views of the general area including the work stations and the entry door, and will provide audio/video coverage. Video tapes of the surveillance rooms are to be sealed and forwarded to the Tribal Inspector's office. These tapes are to be viewed by the Tribal Inspector's office only.
- d. Personnel - The surveillance room is to be staffed to provide coverage of all shifts and activities in the casino.
- e. Logs - Authorized surveillance personnel shall maintain the following logs:
 - (1) Sign-in logs for nonsurveillance authorized personnel.
 - (2) Daily activity logs.
 - (3) Video library logs.

In addition, a report/log is prepared for any unusual items noted or possible infractions of procedures and is forwarded to the appropriate personnel.

- f. Equipment - The observation equipment shall be a matrix-type switching system with the capabilities of pan-tilt-zoom (PTZ) or have the capability to bring up any camera throughout the casino to a designated monitor. The

Subsection 1

Table Games Department Overview

- A. The table games area consists of one or more pits throughout the casino. Each pit generally consists of a group of twelve tables or less made up of various table limits.
- B. Personnel assigned
 - 1. The following personnel will be used to operate and conduct the table games:
 - a. Shift supervisor - Minimum of one per shift when two or more pits are open.
 - b. Pit boss - Minimum of one per open pit.
 - c. Floor Person - Minimum of one for every four open tables or fraction thereof.
 - d. Dealer - Minimum of one per open table.
- C. For all computerized table games systems, a personnel access listing will be maintained which includes at a minimum:
 - 1. Employee name;
 - 2. Employee identification number (or equivalent);
 - 3. Listing of functions employee can perform or equivalent means of identifying same.

NOTE: In emergency situations which require drop box access at other than scheduled count times, at least three persons from separate departments, including management, must participate in these situations. The reason for access must be documented with signatures of all participants and observers.

E. Count Room Keys

1. At least three count team members are required to be present at the time count room and other soft count keys are issued for the soft count.

F. Chip Rack Keys

1. Chip rack keys can only be checked out from the cage by a pit executive (Table Games Director, Shift Supervisor)*. For ease of shift change, a continuous control log of these keys can be kept with Security stationed at the cage entrance.* or Pit Boss
2. The keys to the locked chip racks containing the table inventories will be maintained and controlled by the Shift Supervisor/Pit Boss in a secure place during the shift (see Key Control Section), and at no time be made accessible to any cashiers cage personnel or to any person responsible for transporting such table inventories to or from the gaming tables.

G. Toke Box Keys

1. Toke box keys can only be checked out from the cage by the Toke Committee with Security present.

H. Duplicate Keys

1. All duplicate keys are maintained in a manner which provides the same degree of control over drop boxes as is required for the original keys.

- I. The involvement of at least two individuals independent of the cage department is required to access stored empty drop boxes.

Subsection 7.

Table Inventories

- A. Whenever a gaming table in the casino is opened for gaming, operations will commence with an amount of gaming chips, to be known as the "table inventory", and there will be no additions or deletions during the gaming day except:
1. In exchange for cash and chips presented by casino patrons.
 2. In payment of winning wagers and collections of losing wagers made at such gaming table.
 3. In conformity with the fill and credit slip procedures.
 4. In the removal of defective chips.
- B. Each table inventory and its corresponding table inventory slip ("opener"), prepared in conformity with procedures set forth, will be stored during non-gaming hours in a separate, locked chip rack which includes a clear lid. The chip rack will be clearly marked on the outside with the gaming table number to which it corresponds.
1. The information on the opener will be visible from the outside of the locked chip rack.
 2. Security will provide the necessary protection to insure the integrity of table inventories during non-gaming hours.
- C. Key Control
1. Chip rack keys can only be checked out from the cage by a pit executive (Table Games Director, Shift Supervisor). *For ease of shift change, a continuous control log of these keys can be kept with Security stationed at the cage entrance. * or Pit Boss

4. Opening of Table for Gaming.

- a. Prior to use at the table, ~~six or eight~~^{all} decks of cards* will be sorted and inspected by a dealer and the Floor Person assigned to the table will verify the inspection. * that will be put into play at the table
- b. After the cards are inspected, the cards shall be sorted into sequence and into suit by deck and spread out face upwards on the table, for visual inspection by the first player or players to arrive at the table.
- c. On the arrival of the first player, the dealer announces "shuffle" and waits for an affirmative response from the Floor Person. The dealer then proceeds to pick up the decks one at a time beginning with the outside rows first. Each deck will be placed into the shoe in a staggered fashion.
- d. Taking one deck from the shoe, riffle once and then spread them face down on the layout horizontally from right to left. Taking a second deck from the shoe, riffle once and then spread them face down on the layout horizontally from left to right. Wash the two decks together by mixing in a circular manner and then gather the cards and place them in the discard rack. Repeat the process until all the decks have been washed.
- e. Proceed to the house shuffle.
- f. After the initial shuffle, if the cards are not in use (dead game table) they will be sorted into sequence and into suit by deck and spread face upwards on the table. The first player or players to arrive at the table will be given the opportunity to visually inspect the cards before the opening shuffle procedure is initiated.

5. House Shuffle and Cut of the Cards.

- a. Immediately prior to commencement of play and after any round of play as may be determined by the Tribe, the dealer will shuffle the cards so that they are randomly intermixed.

(10) Number of times cash compartment has been opened.

(11) The number of times the cabinet has been opened.

c. Electronic games of chance utilizing coin drop hoppers are permitted, provided they are monitored by an on-line electronic game management/reporting system which has been approved by the independent gaming test laboratory.

d. The terms "error condition" as used in this subdivision includes:

(1) Cabinet door open and cash compartment door open.

(2) Coin-in tilt and reverse coin-in tilt.

(3) Hopper empty, hopper jam, or hopper runaway/malfunction.

8. Repairs and service:

a. A casino slot technician or authorized casino slot person may open the gaming cabinet to effect repairs and service but shall do so only in the presence of security department personnel* If the on-line electronic game management/reporting system is equipped with player tracking (with the appropriate security levels as approved by the HCGC) and the casino personnel have been assigned an individual access card; a licensed key gaming employee of the casino may be substituted for the security department personnel. Each slot floorperson or slot tech must insert their individual access card into each slot machine containing player tracking to proceed with opening the slot machine for repairs or service.

b. Each time a slot machine is opened, a machine maintenance card is updated. The machine maintenance card contains the machine number, location, date, time and reason the machine was opened, and is signed by the individual opening the machine.

* or under specifically verified observation by Surveillance which shall act as the presence of a second employee as required by the Compact.

- D. Access to the triplicates shall be maintained and controlled at all times by the revenue audit department, or the security department if revenue audit is not present, who is responsible for controlling and accounting for the unused supply of payouts, placing payouts in the dispenser and removing from the dispenser each day the triplicates remaining therein.
- E. The pre-numbered three-part jackpot slip form (for manual jackpots), and the pre-numbered two-part jackpot slip form (for automated jackpots), includes the following information:
1. The casino number of the slot machine on which the jackpot was registered.
 2. The winning combination of reel characters (game outcome) constituting the jackpot (including reel symbols, card values and suits, etc.).
 3. The date and time during which the jackpot occurred.
 4. The dollar amount to be paid from the cage.
 5. The slot booth number, if applicable, from which the dollar amount is to be paid.
 6. The signatures of the preparer, at least two employees verifying and witnessing the payout, and the patron after receiving the payout.
 7. The time of preparation of the jackpot on the original and duplicate.
- F. All jackpot payouts must be in the form of tokens, cash, currency or check and will be disbursed by the slot attendant/floorperson ~~and the security officer~~ directly to the patron; or if the jackpot is \$1,200 or more, by the slot attendant/floorperson ~~and the security officer~~ after approval by the slot shift supervisor or casino shift officer (CSO) directly to the patron.

2. The date and time during which the tokens/coins are distributed.
3. The denomination of tokens/coins to be distributed.
4. The dollar amount of tokens/coins to be distributed.
5. The signatures of at least two employees verifying and witnessing the hopper fill.

NOTE: When the above information has been completed, the cashier or cage supervisor will sign the hopper fill slip while it is in the dispenser. The slot floorperson will sign the original and duplicate before the hopper fill is issued.

- E. The duplicate is maintained by the cashier while the triplicate remains in the dispenser. The cashier then issues the hopper fill to the slot floorperson who takes the hopper fill ~~(with security personnel escort)~~ and the original copy of the hopper fill slip to the slot machine.
- F. The slot floorperson unlocks the machine with their key, fills the hopper and relocks the machine under the observation of security personnel.
- G. The observer then signs the original hopper slip documenting that the tokens/coins were placed in the appropriate machine and the machine was relocked. The complete original hopper slip is then placed into the accounting/security box (boxes may be located throughout the Casino) by the slot floorperson member.
- H. Hopper Slips
1. The duplicate copy of the hopper fill slip is maintained by the cashier and is used as a balancing item for the cashier.
 2. At the end of each shift, the cashier will transfer the duplicate hopper fill slips to the vault for exchange, and the vault will forward the hopper fill slips to revenue audit at the end of each day.

Subsection 3

Preparation of Daily Deposit

- A. Once a day, the daily bank deposit from the casino will be prepared by a vault cashier and held until picked up by the armored car service. The amount of the deposit will be determined by a formula set forth by the casino's Chief Financial Officer and approved by the Legislative Finance Sub-Committee.
- B. The Cage Shift Supervisor will agree the total amounts to be deposited to the daily deposit slip.
 - 1. The cage shift supervisor will date and initial the deposit slip to indicate this agreement.
 - 2. The daily bank deposit will remain in the sealed deposit bag in the vault until the armored car representatives have identified themselves to the vault ~~employee~~ Supervisor responsible for the contents of the vault and has signed a receipt acknowledging the transfer of the deposit bag and its contents.
- C. Once the deposit has been processed by the bank, the validated deposit slips will be forwarded by mail directly to the attention of the accounting department to be dated and initialed after agreement with the invalidated deposit slip verified by the accounting department.

NOTE: If the validated deposit slip is not received within seven (7) days of the deposit being picked up by the armored car carrier, the casino CFO will contact the bank to begin investigating why a validated deposit slip has not been received by the casino. A report regarding the findings of the CFO will be forwarded to the Ho-Chunk Nation Gaming Commission.

Subsection 5

Accounting Controls for Token/Coin Exchange

- A. A change bank is an imprest value of token/coins and currency to be exchanged by a cashier with a patron for currency or coin or chips.
- B. Change banks will be constructed to provide maximum security of the contents maintained therein.
- C. Key Control
 - 1. Each bank will have a separate lock and each will be keyed differently with a master key for all banks.
 - 2. Keys to the banks will be maintained by the cage ~~supervisor~~^{cashier} and issued to the cashier assigned to the change bank.
 - 3. The cashier and the ~~cage supervisor~~^{key cashier} will sign a key log acknowledging the cashiers receipt of the keys.
 - 4. At the end of the cashier's shift the keys are to be returned to the ~~cage supervisor~~^{key cashier}.
 - 5. The cashier and the ~~cage supervisor~~^{key cashier} will sign the key log acknowledging the return of the keys.
- D. A slot change booth/bank will have the ability to complete jackpots and hopper fills in the same manner as the main cage as defined in Section D (Jackpot Payouts and Procedure for Filling Hoppers).
 - 1. All documents will be recorded on a separate controlled document log sheet.
 - 2. At the end of the shift, the slot change booth cashier will add up the total of jackpots and hopper fills and sign the controlled document log sheet.

THE CAGE MANAGER/DIRECTOR OF CAGE OPERATIONS AND THE DIRECTOR OF SECURITY,*IN CONJUNCTION, ARE THE ONLY PERSONNEL AUTHORIZED TO ORDER NEW KEYS AND LOCKS OR THE DUPLICATION OF KEYS.

* (or in the event of absence of either of them, his or her designee)

- A. Supply request will be generated and forwarded to the Cage Manager/Director Of Cage Operations.
- B. A purchase order will be generated and the order will be placed by the Cage Manager/Director Of Cage Operations and the Director Of Security. The purchase order must also be signed by the Chief Financial Officer (CFO) or the General Manager.
- C. When the locksmith arrives at the Casino, they shall be accompanied by security, who will monitor the work being done.
- D. When the work is completed, the locksmith will deliver all keys to the Cage where they will be placed in the appropriate Key Control Box for issuance. Security and cage personnel will sign the Key Log as recipients of the new keys.
- E. Locksmith will supply certificate of what locks were changed and/or what keys were made by identifying by manufacturer and key number. This documentation will be maintained by the Cage in the appropriate Key Control files.
- F. Appropriate documentation will be forwarded to receiving/purchasing for accounting purposes.